

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA

PLAINTIFF

VS.

CRIMINAL NO.: 3:16-CR-29 HTW-LRA-10

**SACHIN GIRISHKUMAR PATEL,
TARUNKUMAR PURUSHOTT AMBHAI PATEL,
SIMPSON LLOYD GOODMNA,
CHIRAG NILESH PATEL,
DANA CHEETARA ADAMS,
BRANDY NICOLE EDWARDS,
TERILYNN RANKIN,
SEJAL SANJAY KAKADIA,
JAVANTIBHAI KALIDAS CHAUDHARI,
VIRENDRA RAMBACHAN RAJPUT, AND
JAVONA SHANICE RAJPUT**

DEFENDANTS

MOTION FOR CONTINUANCE

COMES NOW Defendant, Tarunkumar Purushott Ambhai Patel, by and through counsel, and files this his *Motion for Continuance* in the within cause of action, and in support thereof would show unto the Court the following:

The Defendant, Tarunkumar Purushott Ambhai Patel, was not arraigned until, June 14, 2016. He was released on bond and returned to Missouri.

The Scheduling Order puts the deadlines for all motions at June 23, 2016, and other deadlines remarkably quick with a trial date of July 18, 2016.

A trial of this matter has been set for 9:00 a.m. on July 18, 2016 at the Federal Courthouse, 501 East Court Street, Sixth Floor, Courtroom No. 6A, Jackson, Mississippi, before the Honorable Henry T. Wingate.

The undersigned counsel of record has not had a chance to even discuss this case with his

client, receive the discovery from the United States Government, review the discovery with the client, and seek out any and all other exculpatory evidence necessary to create a defense in this cause of action.

This request for a continuance is not meant for delay, but so that justice and humanity may be served.

WHEREFORE, PREMISES CONSIDERED, Tarunkumar Purushott Ambhai Patel respectfully requests a continuance of the trial in the within cause of action to another date and time set certain and mutually convenient to all parties and the Court.

RESPECTFULLY SUBMITTED, this the 23rd day of **June, 2016.**

TARUNKUMAR PURUSHOTT AMBHAI PATEL

BY: /s/ Ross Robert Barnett, Jr.
ROSS ROBERT BARNETT, JR.

ROSS ROBERT BARNETT, JR. (MSB #2047)
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Counsel for Tarunkumar Purushott Ambhai Patel

CERTIFICATE OF SERVICE

I, Ross Robert Barnett, Jr., attorney for Tarunkumar Purushott Ambhai Patel, do hereby certify that I have this day caused to be served, via the CMEC filing system, and United States Mail, postage prepaid, a true and correct copy of the above and foregoing *Motion for Continuance* to:

Jerry L. Rushing, Esq.
U.S. Attorney's Office
501 East Court Street
Suite 4.430
Jackson, MS 39201

Darren J. Lamarca
Assistant United States Attorney
501 East Court Street, Suite 4.430
Jackson, MS 39201

THIS service effective this the **23rd** day of **June, 2016**.

/s/ Ross Robert Barnett, Jr.

ROSS ROBERT BARNETT, JR.